

From: cathybeaver@gmail.com

Sent: Friday, May 05, 2006 10:47 AM

To: NOP Livestock

Subject: Docket # TM-06-06-PR, NOP Revisions to Livestock Standards

Attachments: ATTACHMENT.TXT

Docket TM-06-06-PR Mark Bradley, NOP:

Mark Bradley, Associate Deputy Administrator Transportation and Marketing Program National Organic Program 1400 Independence Ave., SW, Room 4008--SO, Ag Stop 0268 Washington, DC 20250 Fax (202) 205-7808 NOP.Livestock@usda.gov Docket TM-06-06-PR

As a consumer and supporter of organic agriculture, I am writing to comment on Docket #TM-06-06-PR, NOP - Revisions to Livestock Standards.

I pay a premium for organic foods because I TRUST that the name means what it ought to -- clean, wholesome, non-toxic food. The proposed dilution of the meaning of "organic" does NOT benefit consumers or the true organic companies we support.

Please avoid taking that dire Orwellian step towards redefining words to "mean" whatever The Powers That Be wish -- please preserve the true, honest meaning of "organic".

Thank you for taking my comments into consideration,

standard activist letter below...

Consumers depend on the integrity of the organic label and are willing to pay a premium price in the marketplace for products produced under exacting standards. The USDA should act to ensure that these standards are not undermined.

Unfortunately, USDA's proposed amendments to the National Organic Program (NOP) regulations will weaken the organic law and threaten the meaning of food labeled as "organic." Unless clarified the new regulations could permanently allow numerous new synthetic processing aids, including over 500 food contact substances, to be used in organic foods without any type of public review for their safety and compatibility with organic production and could allow young dairy cows to be treated with antibiotics and then be converted to organic after twelve months.

Please act in the best interest of the entire organic community by taking action on the following:

1. Clarify the origin of livestock transitioning to organic dairy production.

Once an operation has been certified for organic dairy production, all dairy animals, including all replacement animals, should be under organic management from the last third of gestation. If this correction is not made, some operators and certifying agents may interpret the rule as allowing for the continuous conversion of conventionally raised dairy cows to organic production. Without closing this loophole, animals converted this way could be raised with the use of genetically engineered feed, antibiotics and hormones for their first year or so of life - all of which go against the spirit of organic dairy production and consumer expectation.

2. Close the loophole allowing the use of synthetic substances.

USDA's regulation does not address the large loophole allowing some synthetic substances, including "food contact substances" and other processing aids, to be used in organic processing without formal review. The NOSB should review ALL synthetic substances used in organic processing, and all such substances should be added to the National List.

I believe our organic standards should be as strong as possible to ensure that consumers get what they expect from organic products. I urge the USDA to create new regulations that strictly apply the recent amendment to the OFPA.

Thank you for taking my comments into consideration,

Sincerely,

Catherine Beaver